

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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FRANCESCO PORTELOS,

Plaintiff,

-against-

**NOTICE OF MOTION *IN*
*LIMINE***

THE CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF EDUCATION; DENNIS WALCOTT,
CHANCELLOR OF NEW YORK DEPARTMENT OF
EDUCATION; LINDA HILL, PRINCIPAL OF I.S. 49, IN
HER OFFICIAL AND INDIVIDUAL CAPACITY;
ERMINIA CLAUDIO, IN HER OFFICIAL AND
INDIVIDUAL CAPACITY AS DISTRICT
SUPERINTENDENT,

12 CV 3141 (LDH)(VS)

Defendants.

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PLEASE TAKE NOTICE that, upon all the prior proceedings heretofore had herein; defendants City of New York, New York City Department of Education, Dennis Walcott, Linda Hill, and Erminia Claudio, by their attorney, Zachary W. Carter, Corporation Counsel of the City of New York, will move this Court, before the Honorable LaShann DeArcy Hall, United States District Judge, Eastern District of New York, at the courthouse thereof, located at 225 Cadman Plaza East, Brooklyn New York 11201, at a date and time to be determined by the Court, for an order precluding plaintiff from offering the testimony of Laura Cavallieri, Diane Vines, Richard Marin, Robert Laino, Greg Bowen, Lawrence Scott, Sean Rotkowitz, Desmond White, Robin Singer, Marisol Vasquez, David Brodsky and Richard Condon; any evidence or testimony asserting malfeasance by SCI, and a number of exhibits, and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Individual Practices, plaintiff's opposition is due by July 8, 2016.

Dated: New York, New York
June 30, 2016

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City of New York
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By: /s/
Jessica Giambrone
Assistant Corporation Counsel

To: GLASS KRAKOWER LLP
Counsel for Plaintiff